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BY ECF & ELECTRONIC MAIL

The Honorable Edward R. Korman
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201


Re: United States v. Wael Bakry, et al. 17 Cr. 353 (ERK)

Your Honor:

Along with Avraham Moskowitz, I am co-counsel to Mr. Wael Bakry in the above-referenced case. Mr. Bakry is being prosecuted for conspiracy to commit health care fraud (Count 1); conspiracy to pay health care kickbacks (Count 2); money laundering conspiracy (Count 3); conspiracy to defraud by obstructing the lawful functions of the Internal Revenue Service (Count 4); subscribing to a false and fraudulent tax return (Count 8), and false claims (Counts 12 and 13). We write to respectfully request to join in the application made by defendant Mayura Kanekar related to *Brady, Giglio*, and 18 U.S.C. § 3500 materials, and the proposed jury instructions/verdict form, both of which were filed on May 16, 2022. (Dkt. Nos. 308, 309). Because Mr. Bakry is charged with the same crimes as Ms. Kanekar, the proposed jury instructions and verdict form by Ms. Kanekar, would, if adopted, necessarily flow through to Mr. Bakry.

We thank the Court for its attention to this matter.

Very Truly Yours,
Schulman Trial, PLLC


By: _____
Eylan Schulman